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November 19, 1999

Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Valley Telephone Cooperative, Inc.
Copper Valley Telephone, Inc.
CC Docket No. 98-170
Supplement to Waiver Request Filed November 3, 1999

Dear Ms. Salas:

On November 3, 1999, Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the "Companies") filed a Petition for Temporary, Limited Waiver in CC Docket No. 98-170. That Petition sought waiver of certain of the Commission's Truth-in-Billing ("TIB") rules, specifically 47 C.F.R. § 64.2401(b) (the service description requirement) and 47 C.F.R. § 64.2401(d) (the inquiry contact requirement).¹ The need for waiver arises from, *inter alia*, the billing services that the Companies provide for casual calling and alternate service providers (collectively "AOS providers"). The Companies provided the factual basis demonstrating the infeasibility at this time of providing a description of certain local calling features, and the the inquiry contact number of the various AOS providers for which the Companies provide billing and collection services.

On November 15, 1999, the Companies received updated information from their billing software vendor that there is also a need for a waiver of 47 C.F.R. § 64.2401(a)(1) (with respect to the requirement to provide the name of the AOS provider associated with the charges) and of 47 C.F.R. § 64.2401(a)(2) (regarding separation of charges by service provider) (collectively referred to as the "TIB Separate Provider Requirements"). Based on the updated information and discussions with their billing software vendor, this additional request for waiver arises from the use of "sub-CICs" by certain AOS providers who also are aggregators.² In particular, in light of

¹ Attached is the declaration of Judy Bruns, Chief Executive Officer/General Manager of Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. The declaration bears a facsimile signature. The original signed declaration will be filed with the Commission upon receipt by counsel.

² The explanation of how the use of sub-CICs arises is addressed in a pending Joint Petition filed by the National Exchange Carrier Association, Inc., the National Telephone Cooperative Association (whose membership includes the Companies), and the Organization for the Promotion

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the Companies' existing billing software, it is infeasible for each of them to comply with the TIB Separate Provider Requirements for charges that are sent to the Companies for billing where the AOS provider uses a sub-CIC.

In addition, although the Companies initially determined that waiver of certain TIB requirements was necessary until January 15, 2000, they now seek waiver of the referenced TIB rules until April 1, 2000. This revised date, which was discussed with their billing vendor, should ensure that the necessary billing software updates for identification and separation of sub-CIC data are provided and successfully tested within the Companies' billing system.

The factual and policy basis demonstrating why the public interest would be served by granting the Companies a temporary, limited waiver of the inquiry contact requirement also generally applies to the Companies' inability to provide the name of the AOS provider and the separation of AOS provider. As previously noted by the Companies, consumer inquiries regarding AOS provider charges, have been minimal.

Accordingly, in light of new information received on November 15, 1999 by the Companies from their billing software vendor, the Companies hereby supplement their waiver request to seek waiver of 47 C.F.R. §§ 64.2401(a)(1) and (a)(2), in addition to their previous request for a waiver of 47 C.F.R. §64.2401(b), and 47 C.F.R. § 64.2401(d).

Should there be any questions, please contact the undersigned.

Respectfully submitted,

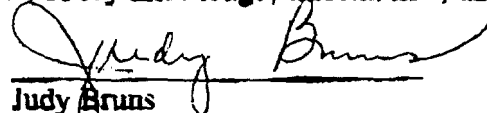

Margaret Nyland

and Advancement of Small Telecommunications Companies, Inc. Accordingly, the Companies incorporate that discussion herein.

Supplemental Declaration of
Judy Bruns

I, Judy Bruns, Chief Executive Officer/General Manager of Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. (the "Companies"), do hereby declare under penalties of perjury that I have read the foregoing letter filing and the information contained therein regarding the Companies is true and accurate to the best of my knowledge, information, and belief.

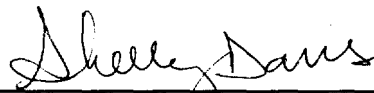
Date 11/19/99



Judy Bruns
Chief Executive Officer/General Manager

CERTIFICATE OF SERVICE

I, Shelley Davis, of Kraskin, Lesse & Cosson, LLP, 2120 L Street, NW, Suite 520, Washington, DC 20037, hereby certify that a copy of the foregoing "Supplement to Waiver Request Filed November 3, 1999" of Valley Telephone Cooperative, Inc. and Copper Valley Telephone, Inc. was served on this 19th day of November, 1999 by hand delivery to the following parties:



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